

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

<i>In re:</i>	§	
	§	CHAPTER 11
KrisJenn Ranch, LLC,	§	
	§	
<i>Debtor</i>	§	CASE No. 20-50805

KrisJenn Ranch, LLC, et al.,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	
	§	ADVERSARY No. 20-05027
DMA Properties, Inc.; and Longbranch	§	
Energy, LP, et al.,	§	
	§	
<i>Defendants.</i>	§	

DMA Properties, Inc. and Longbranch	§	
Energy, LP, et al.	§	
	§	
<i>Counterplaintiffs,</i>	§	
	§	
v.	§	
	§	ADVERSARY No. 20-05027
KrisJenn Ranch, LLC; Larry Wright, et	§	
al.,	§	
	§	
<i>Counterdefendants.</i>	§	

JOINT MOTION TO EXTEND BRIEFING DEADLINES

On May 31, the Court held a status conference in this matter and set a schedule for briefing on remedies following remand of this case from the district court. DMA, Moore, and Longbranch’s briefing is currently due on July 14, 2023, while Wright and

KrisJenn's briefing is currently due on August 11, 2023. Order [#294]. The Court set this matter for argument on August 22, 2023 (but later converted this hearing into a status conference). Order [#299]; Notice of Status Hearing [#300]. Finally, the Court also ordered the parties to mediate this case. *See* Order [#301].

The parties now jointly move to extend the briefing deadlines in this case in order to allow the parties to mediate this case on July 21, 2023. The parties believe that moving the briefing deadlines until after the mediation will facilitate settlement discussions. The Court and the parties can jointly coordinate at the status conference on August 22 regarding resetting this matter for argument if the mediation is not successful.

CONCLUSION

The parties thus respectfully request that the Court that the Court extend the briefing deadlines in this case as follows:

- DMA, Moore, and Longbranch's briefing shall be due on August 11, 2023.
- Wright and KrisJenn's briefing shall be due on September 8, 2023.

Respectfully submitted,

/s/ Christopher S. Johns

Christopher S. Johns
State Bar No. 24044849
JOHNS & COUNSEL PLLC
2028 East Ben White Boulevard
Suite 240-1000
Austin, TX 78741
512-399-3150
512-572-8005 fax
cjohns@johnsandcounsel.com

/s/ Timothy Cleveland

Timothy Cleveland
State Bar No. 24055318
Austin Krist
State Bar No. 24106170
CLEVELAND | TERRAZAS PLLC
303 Camp Craft Road, Suite 325
Austin, Texas 78746
(512) 689-8698
tcleveland@clevelandterrazas.com
akrist@clevelandterrazas.com

*Attorneys for Longbranch Energy, DMA
Properties, and Frank Daniel Moore*

Andrew R. Seger
State Bar No. 24046815
KEY TERRELL & SEGER
4825 50th Street, Suite A
Lubbock, Texas 79414
806-793-1906
806-792-2135 fax
aseger@thesegerfirm.com

/s/ John Muller

C. John Muller IV
State Bar No. 24070306
john.muller@cjma.law
Jason H. Casell
State Bar No. 24063869
jason.casell@cjma.law
111 W. Sunset Rd.
San Antonio, TX 78209
Telephone: 210-664-5000
Facsimile: 210-899-1933

Attorneys for Debtors

Natalie F. Wilson
State Bar No. 24076779
LANGLEY & BANACK
745 East Mulberry Avenue, Suite 700
San Antonio, Texas 78212
210-736-6600
210-735-6889 fax
nwilson@langleybanack.com

*Attorneys for DMA Properties and Frank
Daniel Moore*

Michael Black
BURNS & BLACK PLLC
750 Rittiman Road
San Antonio, TX 78209
mblack@burnsandblack.com

Jeffery Duke
DUKE BANISTER MILLER & MILLER
22310 Grand Corner Drive, Suite 110
Katy, TX 77494
jduke@dbmmlaw.com
Attorneys for Longbranch Energy

CERTIFICATE OF CONFERENCE

I hereby certify that I have conferred with opposing counsel regarding this motion, and opposing counsel indicated that Wright and KrisJenn do not oppose this motion or the extensions sought herein.

/s/ Austin H. Krist
Austin H. Krist

CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2023, a true and correct copy of the foregoing document was transmitted to each of the parties via the Court's electronic transmission facilities and/or via electronic mail as noted below. For those parties not registered to receive electronic service, a true and correct copy of the foregoing document was served by United States Mail, first class, postage prepaid, at the address noted below.

<p>Charles John Muller, IV CJ MULLER & ASSOCIATES, PLLC 111 W. Sunset San Antonio, TX 78209 ron@smeberg.com john.muller@cjma.law</p> <p><i>Counsel for KrisJenn Ranch, LLC, Krisjenn Ranch, LLC—Series Uvalde Ranch, KrisJenn Ranch, LLC—Series Pipeline Row</i></p>	<p>Michael Black BURNS & BLACK PLLC 750 Rittiman Road San Antonio, TX 78209 mblack@burnsandblack.com</p> <p>Jeffery Duke DUKE BANISTER MILLER & MILLER 22310 Grand Corner Drive, Suite 110 Katy, TX 77494 jduke@dbmmlaw.com</p> <p><i>Counsel for Longbranch Energy, LP</i></p>
<p>Ronald J. Smeberg THE SMEBERG LAW FIRM, PLLC 2010 W Kings Hwy San Antonio, TX 78201-4926 ron@smeberg.com</p> <p><i>Counsel for Black Duck Properties, LLC</i></p>	<p>James Rose OFFICE OF THE U.S. TRUSTEE 903 San Jacinto Blvd, Room 230 Austin, TX 78701 james.rose@usdoj.gov</p> <p><i>United States Trustee</i></p>
<p>William P Germany BAYNE, SNELL & KRAUSE 1250 N.E. Loop 410, Suite 725 San Antonio, TX 78209 wgermany@bsklaw.com</p> <p><i>Counsel for Larry Wright</i></p>	<p>Laura L. Worsham JONES, ALLEN & FUQUAY, L.L.P. 8828 Greenville Avenue Dallas, TX 75243 lworsham@jonesallen.com</p> <p><i>Counsel for McLeod Oil, LLC</i></p>

/s/ Christopher S. Johns
Christopher S. Johns